

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1. SHERRY PRICKETT, an individual)	
)	
Plaintiff,)	
)	
vs.)	Case No. 15-cv-00190-TCK-TLW
)	
1. SASHAY CORPORATE SERVICES,)	
LLC, d/b/a AUTOMATED MAIL)	
SERVICE, a Domestic Limited Liability)	
Company,)	
Defendant.)	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1367 and 1441 *et seq.*, Defendant, Sashay Corporate Services LLC, d/b/a Automated Mail Service, a Domestic Limited Liability Company (“Defendant”), hereby removes this action from the District Court of Tulsa County, State of Oklahoma, to the United States District Court for the Northern District of Oklahoma. In support of this Notice of Removal, Defendant states as follows:

1. On March 30, 2015, Plaintiff, Sherry Prickett (“Plaintiff”), filed a Petition in the District Court of Tulsa County, State of Oklahoma, styled *Sherry Prickett v. Sashay Corporate Services, LLC, d/b/a Automated Mail Service, a Domestic Limited Liability Company*, Case No. CJ-2015-01227.

2. On April 6, 2015, Defendant was served with the Original Summons and a copy of the Petition. A copy of the Original Summons and Petition served on Defendant are attached hereto as Exhibit 1.

3. No further process, pleadings or motions have been served and no further proceedings have taken place in this action. A copy of the state court docket sheet is attached hereto as Exhibit 2.

4. Plaintiff's Petition contains claims for relief for (1) employment discrimination based on Plaintiff's gender in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, *et seq.* ("Title VII") and (2) hostile work environment in violation of Title VII. *See* Petition, ¶¶ 20 and 25, Exhibit 1.

5. Plaintiff's Petition is a civil action over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1331, in that Plaintiff's claims of discrimination based on her gender allegedly violate the laws of the United States. As a civil action founded on a claim or right arising under the laws of the United States, this action is removable to this Court pursuant to 28 U.S.C. § 1441(a).

6. To the extent that Plaintiff has asserted claims not arising under the laws of the United States, those claims "are so related to claims in the action within such original jurisdiction [of this Court] that they form part of the same case or controversy under Article III of the United States Constitution." 28 U.S.C. § 1367(a).

7. This Notice of Removal is being filed within 30 days after receipt of the Petition as required by 28 U.S.C. § 1446(b).

8. A copy of this Notice of Removal will be filed with the Clerk of the District Court of Tulsa County, State of Oklahoma, and served upon all adverse parties as required by 28 U.S.C. § 1446(d).

9. By submitting this Notice of Removal, Defendant does not waive its right to assert any defenses, rights, claims or other motions, including Rule 12 motions, permitted by the Federal Rules of Civil Procedure or other applicable rules or laws.

WHEREFORE, Defendant respectfully removes this action from the District Court of Tulsa County to the United States District Court for the Northern District of Oklahoma, and requests that this lawsuit proceed under this Court's jurisdiction.

Respectfully submitted,

s/Michael L. Covey Jr.

Michael L. Covey Jr., OBA # 18360

Attorney At Law

11301 S. Fulton Ave.

Tulsa, OK 74137

Telephone: 918-625-5820

Email: mcovey@cox.net

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2015, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Daniel E. Smolen

s/Michael L. Covey Jr.

Michael L. Covey Jr.